

EXHIBIT C

Jess Dickinson 11/29/2018

1 90 percent fixed cap for just a moment.

2 It is based on a weighted case value
3 matrix, isn't it, sir?

4 A. Yes.

5 Q. And the values on that matrix add up to
6 1.0?

7 A. Yeah.

8 Q. And the -- so at the first level of
9 fixed standard, the standard is 1.0, is it not,
10 the first level of standard?

11 A. If I understand what you mean by "first
12 level of standard," yes, that's the standard that
13 caseworkers are judged by.

14 Q. And then the second level of standard is
15 what we've referred to as the 90 percent case
16 worker caseload standard or compliance standard?

17 A. Number of caseworkers in compliance
18 standard is what I call it.

19 Q. All right. We're saying the same thing.

20 A. Yeah.

21 Q. And that is a -- the second standard, at
22 least, although I think both of them apply, those
23 are rigid, fixed standards which are being
24 addressed in these depositions in terms of
25 compliance, are they not?

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1 A. Yes.

2 Q. You can also determine, based on the --
3 the caseload metric workers who are in a close
4 category.

5 Are you aware of that?

6 A. Yes.

7 Q. So the first category would be net,
8 which is 10 and below.

9 A. Yes.

10 Q. And the second category would be greater
11 than 1.0 but less than 1.2?

12 A. It is.

13 Q. Are you aware that a worker can have a
14 one point net value, and by simply being assigned
15 one additional investigation would fall into the
16 close category?

17 A. Yes.

18 Q. Without going through all of the
19 reasons, because others have discussed this, based
20 on your experience as commissioner and your
21 overall experience, do you believe that the
22 90 percent fixed caseload cap is detrimental to
23 children?

24 A. I believe it that it can be, yes.

25 Q. And can it also be detrimental to

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1 management of the child protection agency in
2 Mississippi?

3 A. Yes.

4 Q. To your knowledge, has child
5 protection -- has CPS and/or its predecessor, ever
6 achieved a 90 percent caseload compliance in the
7 history of the agency?

8 A. Not that I know of.

9 Q. Did it achieve a 90 percent caseload
10 compliance during David Chandler's tenure?

11 A. Did not.

12 Q. Are you aware that the plaintiffs in
13 this case are asking the Court to place this
14 agency in a receivership?

15 A. Yes.

16 Q. Would a receivership in your view be
17 detrimental to children in the state of
18 Mississippi?

19 A. Absolutely.

20 Q. Child Protective Services at this time
21 is still a part of the DHS, is it not, sir, with
22 independent operational authority?

23 A. Yes.

24 Q. So a receivership would actually be
25 taking over a -- an agency that is part of a

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1 larger agency, would it not, sir?

2 A. Yes.

3 Q. Again, your opinion is unequivocal that
4 that would be detrimental to children and to the
5 agency?

6 A. Yes.

7 Q. Now, let's talk just a little bit about
8 your experience. You have dwelled on that quite a
9 lot today.

10 You have started as commissioner on
11 September 18th of 2017?

12 A. Yes.

13 Q. And you did several due diligence with
14 regard to that agency prior to that date, did you
15 not?

16 A. I did.

17 Q. And as part of that due diligence, you
18 met with John Davis, Executive Director of DHS,
19 and David Chandler, who at the time was the
20 Commissioner of CPS?

21 A. Yes.

22 Q. And is it your testimony that you were
23 assured by Mr. Chandler, by David Chandler, that
24 funding would not be a problem for CPS in general
25 terms?